



Planning Statement

Land at New Park Road, Lambeth

April 2025

SPHERE 25
PLANNING CONSULTANCY

Contents

1. Introduction	2
2. The Site and its Context	7
3. Planning History	9
4. Pre-Application and Stakeholder Engagement	14
5. Application Proposals	18
6. Planning Policy Context	23
7. Planning Assessment	35
8. Affordable Housing Statement	51
9. Planning Benefits	53
10. Summary & Conclusion	55
Appendix A: Section 106 Draft Heads of Terms	56

1. Introduction

- 1.1 This Planning Statement has been prepared by Sphere25 on behalf of Metropolitan Housing Trust Limited (the 'Applicant' hereafter referred to as 'MHTL'). This Planning Statement supports an application for full planning permission for a residential development (the 'Proposed Development') of Land at New Park Road, Lambeth (the 'Site').
- 1.2 The application seeks full planning permission for the following proposed description of development:

“Full planning application for development of affordable residential homes (Use Class C3) within four blocks and associated landscaping, blue badge car parking and cycle parking”

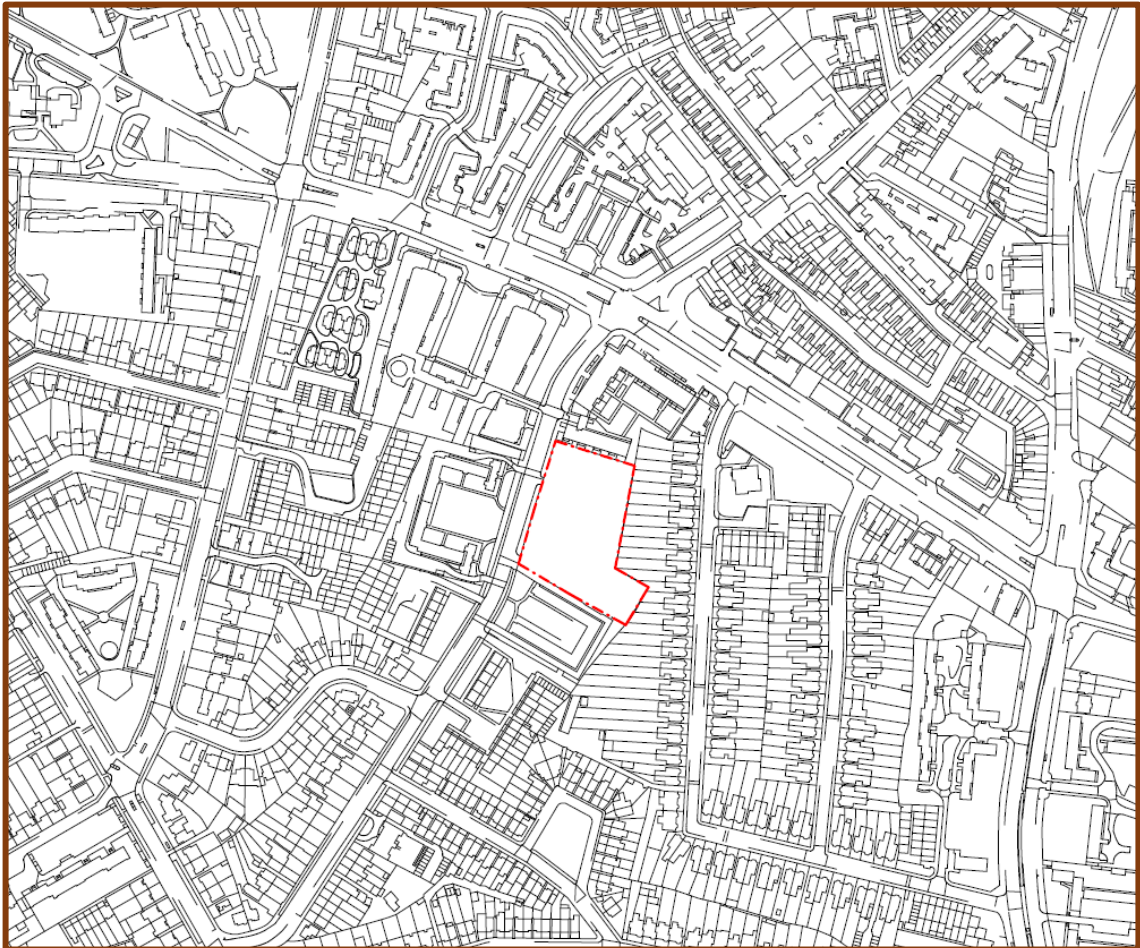


Figure 1: Site Location Plan

Metropolitan Housing Trust Limited

- 1.3 In 2018, Metropolitan Housing Trust Limited (MHTL) was formed through the merger of Metropolitan and Thames Valley Housing. They are a housing association which provides affordable housing for people living in London, the Southeast, East Midlands, and East of England and own, manage, or administer around 57,000 homes across the country. MHTL own and manage the regeneration estates known as Clapham Park and Ashmole in Lambeth. Land at New Park Road falls within the planning boundary of the Clapham Park Masterplan Estate.

Format of Submission

- 1.4 The planning application submission is accompanied by a package of supporting information. In this document, reference will be made, where appropriate, to the conclusions and details contained within these supporting documents.
- 1.5 This Planning Statement should be read in conjunction with the following documents and plans submitted for approval, which are set out below. A list of drawing numbers has also been provided within the Covering Letter.

Document	Author
Overarching Documents	
Application Form (incl. Ownership Certificates and Notices)	Sphere25
Design and Access Statement	Haworth Tompkins
Site Location Plan	Haworth Tompkins
Existing Site Plan	Haworth Tompkins
Proposed Site Plan	Haworth Tompkins
Existing Elevations	Haworth Tompkins
Proposed Elevations	Haworth Tompkins
Proposed Floor Plans	Haworth Tompkins
Existing Cross Sections	Haworth Tompkins
Proposed Cross Sections	Haworth Tompkins
Proposed Roof Plans	Haworth Tompkins
Area and Accommodation Schedule	Haworth Tompkins
Unit Schedule	Haworth Tompkins
Community Infrastructure Levy Form	Sphere25
Statement of Community Involvement	Cloverdale Barclay

Document	Author
Transport/Highways	
Transport Assessment	Markides Associates
Travel Plan	Markides Associates
Delivery and Servicing Plan	Markides Associates
Operational Waste Management Plan	Markides Associates
Parking Stress Survey (incl. in Transport Assessment)	Markides Associates
Refuse and Recycling Strategy (incl. in Transport Assessment)	Markides Associates
Landscape, Ecology, and Trees	
Landscape Statement	PRP Landscape
Landscape Plan	PRP Landscape
Preliminary Ecological Appraisal Report	Greenwood
Biodiversity Net Gain Assessment	Greenwood
Biodiversity Net Gain Metric Spreadsheet	Greenwood
Biodiversity Net Gain Note	PRP Landscape
Aboricultural Impact Assessment	Arborterra
Lighting Assessment (incl. in Section 4 of Landscape Statement)	PRP Landscape
Amenity, Play Space and Open Space Assessment (incl. in Landscape Statement)	PRP Landscape
Urban Greening Factor Assessment (incl. in Section 4 of Landscape Statement)	PRP Landscape
Sustainability and Energy	
Sustainability Statement	XCO2
Energy Statement	XCO2
Overheating Risk Assessment	XCO2
Circular Economy Statement	XCO2
Whole Lifecycle Carbon Assessment	XCO2
Be Seen Spreadsheet	XCO2
GLA Carbon Emission Reporting Spreadsheet	XCO2
Environmental Reports	
Flood Risk Assessment and Drainage Strategy Report	Tullys

Document	Author
Air Quality Assessment	XCO2
Environmental Noise Assessment	XCO2
Daylight, Sunlight and Overshadowing Assessment	XCO2
Proposed Scheme Daylight, Sunlight and Overshadowing Assessment	XCO2
Desk Study, Site Investigation and Risk Assessment Report	Southern Testing
Social Infrastructure Impact Assessment	Greengage
Equalities Impact Assessment	Greengage
Health Impact Assessment	Greengage
Utilities Statement Report	XCO2
Technical / Construction Reports	
Affordable Housing Statement (incl. in Planning Statement)	Sphere25
S106 Draft Heads of Terms (incl. in Planning Statement)	Sphere25
Fire Strategy	Robson Frankham
Archaeological Desk Based Assessment	HCUK Group
Heritage Impact Assessment	HCUK Group
Construction Environmental Management Plan	Vistry Group
Site Waste Management Plan	Vistry Group
Housing Quality Statement (incl. in Section 7.1 of DAS)	Haworth Tompkins
Inclusive Design Statement (incl. in Section 7.3 of DAS)	Haworth Tompkins
Safety, Security and Emergency Strategy (incl. in Section 7.8 DAS)	Haworth Tompkins
M4 Compliance Floor Plans (incl. in Sections 7.4 to 7.7 of DAS)	Haworth Tompkins
Accessibility Statement (incl. in Section 7.3 DAS)	Haworth Tompkins

Figure 2: Submitted supporting planning application information

Structure of the Planning Statement

- 1.6 The purpose of this Planning Statement is to set out the planning rationale that underpins the Planning Application and to demonstrate its acceptability in planning terms. This Statement is structured as follows:
- 1.7 Section 1 provides an **Introduction** to the Planning Application.
- 1.8 Section 2 describes the **Site and its Context**. This section outlines the site and planning history as well as the physical features and surrounding land uses that characterise the Site and wider area, including the Clapham Park Masterplan.
- 1.9 Section 3 provides the **Planning History**. This sets out the site planning history and associated surrounding planning history.
- 1.10 Section 4 outlines the **Pre-Application and Stakeholder Engagement** including public consultation and engagement with the local authority, Design Review Panel, and Secured by Design.
- 1.11 Section 5 describes the **Application Proposals**. This includes references to design, density, scale, mix, and other detailed specifications of the scheme.
- 1.12 Section 6 sets out the **Planning Policy Context**. Here, relevant national, regional, and local planning policies are outlined. This section explains the policy framework against which the application will be considered.
- 1.13 Section 7 provides a **Planning Assessment** of the proposals. This section begins with the principle of development and then considers the appropriateness of the applications characteristics. This includes use, scale, and amenity space provision amongst other principles.
- 1.14 Section 8 is an **Affordable Housing Statement**. This statement provides a further overview of the affordable tenure split and relevant policy compliance.
- 1.15 Section 9 summarises the key **Planning Benefits** of the proposal. This includes the delivery of affordable homes and amenity space amongst other benefits.
- 1.16 Section 10 sets out a short **Summary and Conclusion** of this Planning Statement.

2. The Site and its Context

The Site

Site Description

- 2.1 The site is located in the Clapham Park Ward in the London Borough of Lambeth. The site was previously developed consisting of two buildings, Aspinall House at 3 to 4 storeys and Parsons House at 6 storeys. Both buildings were demolished several years ago, in 2016.
- 2.2 The site has been vacant since then and hoarding has been situated along the frontage of the site facing New Park Road.

Access

- 2.3 The PTAL rating in the northern part of the site is 5 (high), while the southern part of the Site reduces to 3 (moderate).
- 2.4 The site is located within a 5 minute walk from bus stops served by a number of local bus routes. The site is not close to main rail or underground stations, but can be reached by bus. Brixton Station is approximately a half an hour walk from the site and Clapham South Station is approximately 24 minutes walk from the site.
- 2.5 The centre of Brixton and Clapham District Centre Primary Shopping Area are both located 2.3 km from the site. The site is in close proximity to a number of public parks. Brockwell Park is approximately a 26 minute walk from the site and Tooting Bec Common is approximately a 14 minute walk from the site. The site is also situated within the Clapham Park Masterplan boundary which has been approved to deliver additional green spaces. Within 200 metres of the site, the Site E MUGA, Site F Green Avenue, and Tierney Gardens will be delivered.

Site Designations

- 2.6 There are various Conservation Areas around the site, the closest being Telford Park Conservation Area approximately 200 meters to the South. Streatham High Road and Streatham Hill Conservation Area, Rush Common and Brixton Hill Conservation Area, and Hyde Farm Conservation Area are within half a mile from the site.
- 2.7 The closest heritage listed building is located circa. 75 metres North of the site (Brashiers Cottage, Grade II Listed Building¹).

The Surrounding Context

- 2.8 The site is bound by various residential buildings. 95-103 New Park Road is a residential building to the North built recently and under ownership by the applicant. Cameford Court is

¹ List Entry 1390764 (<https://historicengland.org.uk/listing/the-list/list-entry/1390764>)

located to the West across New Park Road and Hayes Court / Fortrose Gardens is located to the South. Hayes Court is a residential building that has been granted permission to be demolished and replaced by Site F as part of Clapham Park Masterplan redevelopment works².

- 2.9 The eastern boundary of the Site is abutted by the rear gardens of the houses on Tierney Road. Several of these gardens have a depth in excess of 30 metres measured to the shared boundary. Some well-established groups of trees along this boundary act as a green buffer zone to the houses.
- 2.10 A series of residential buildings sits to the North-West of the site including Angus House, Cotton House, Currie House, and Crossman House located on the junction of New Park Road and Atkins Road. These buildings are to be demolished and replaced by Site E as part of the Clapham Park Masterplan redevelopment works³.

Clapham Park Masterplan

- 2.11 The Clapham Park Masterplan covers an area of approximately 33 hectares and it is predominantly residential in character, comprising over 2,500 new homes, together with public spaces and infrastructure. The permission also provides circa. 2,500sqm of non-residential floorspace including retail, office, and community facilities.
- 2.12 The estate was selected as a 'New Deal for Communities' (NDC) neighbourhood, a government initiative to regenerate deprived areas, and was transferred to Metropolitan from the London Borough of Lambeth in 2006, in order to facilitate its refurbishment and redevelopment.
- 2.13 The key principles behind the masterplan were to create safe and secure streets, rebuild community networks, create a centrally located hub for larger facilities, and a central park space which delivered a large majority of the public open space provision, alongside local spaces for each area of the masterplan.
- 2.14 The masterplan also sought to create an inclusive community with a choice of types of home. The worst stock was to be replaced by high quality homes, and high quality existing stock was retained but improved with refurbishment works.

² Site F approved under application 17/03733/FUL for 164 homes including buildings between 4 and 6 storeys

³ Site E approved under application 17/03733/FUL for 375 homes including buildings between 4 and 11 storeys

3. Planning History

Site Planning History

Clapham Park Masterplan

- 3.1 The Clapham Park Masterplan area has experienced an extensive planning and development history, which is discussed in this section. One of the earlier planning applications within the area was submitted to Lambeth in September 2005 (Ref. 05/02732/OUT). This application proposed the construction of up to 2,366 new homes, which was granted outline planning permission in June 2006. However, since the masterplan was considered unviable, a subsequent planning application was submitted (Ref. 06/03680/OUT).
- 3.2 Clapham Park Estate was selected as a 'New Deal for Communities' (NDC) neighbourhood, a government initiative to regenerate deprived areas, and was transferred to Metropolitan from the London Borough of Lambeth in 2006, to facilitate its refurbishment and redevelopment.
- 3.3 This planning application included an additional site called 'The Clifton House Site', helping to overcome viability issues. This planning permission proposed the construction of up to 2,422 new homes and was granted planning permission in September 2008. Subsequent reserved matters applications and discharge of condition applications have been approved and this has now been partially implemented across the masterplan area.
- 3.4 This outline permission secured the delivery of a six storey building on the Land at New Park Road site comprising a primary school at ground and first floor and 36 residential homes above.
- 3.5 In 2015, Metropolitan approached the London Borough of Lambeth to reconsider the later phases of the 2008 masterplan, and the opportunity to deliver a revised detailed scheme which would deliver additional housing than previously granted. This was driven by some inefficiencies in the 2008 masterplan design, introduction of new planning policy, and legislative standards since the outline permission was granted, along with a desire to ensure that the original objectives for delivering Clapham Park's regeneration was fully realised.
- 3.6 Subsequently, the planning application underwent several Reserved Matters applications and Minor Material Amendments before being re-visioned by the most recent masterplan application.
- 3.7 This masterplan planning application (Ref. 17/03733/FUL) was granted full detailed planning permission in December 2019 for up to 2,532 homes and 2,537sqm of non-residential floorspace. The detailed elements of the masterplan did not incorporate the Land at New Park Road site. Several of the approved phases have been commenced and/or are near completion at the time of writing. These areas of construction are circa. 500 metres North of the site.

- 3.8 Figure 3 includes the planning history for the Clapham Park Masterplan, of which the proposed development site sits within. Details of the proposals at Land at New Park Road were not included within the most recent 2019 planning application however its approved surrounding in regard to the masterplan are still of relevance and material consideration.

Application Reference	Description of Development	Status
17/03733/FUL	Full phased planning permission for the residential-led, mixed use regeneration of approximately 33 hectares of land comprising the demolition of buildings (864 residential units and 614 sq.m (GIA) of non-residential floorspace) and the construction of new buildings comprising 2,532 new residential units (Class C3); 2,537 sq.m (GIA) of non-residential floorspace providing retail floorspace (Class A1/A2/A3/A4), community facilities (Class D1/D2) including a new community resource centre, and office floorspace (Class B1); specified accesses and highway improvements (including new accesses on to the local road network and new estate roads), demolition of existing and provision of new bus driver facility; car and cycle parking; the provision of areas of public open space, play facilities, hard and soft landscaping and public realm works; and an energy centre and district heating.	Approved 20 th December 2019
08/03416/REM Precincts M2 and M3 (north of site), Clapham Park Masterplan	Partial discharge of reserved matters (Condition 10: land use, layout, scale, appearance and landscaping) for a part 7, part 6 and part 5 storey mixed use development to include a retail unit (Class A1, A2 A3 and A4) of 264sqm, 113 residential units (Class C3), an associated energy centre, access; car and cycle parking and hard and soft landscaping in respect of precincts M2 and M3 (at junction of New Park Road and Streatham Place) of planning permission ref 06/03680/OUT (mixed use regeneration of approximately 36 hectares of land including up to 1,037 residential units (Class C3), the refurbishment of retained housing stock (including up to 960 residential units (Class C3)) and the construction of new residential buildings (including up to 2,422 residential units (Class C3), an elderly extra care facility (including up to 51 units comprising up to 5,488m2	Approved 3 rd December 2008

	(Class C2 and a community hub (sui generis uses)) and ancillary community and commercial buildings, granted on 11.09.2008.	
06/03680/OUT	A residential-led mixed use regeneration of approximately 36 hectares of land comprising the demolition of buildings (including up to 1,037 residential units (Class C3)), the refurbishment of retained housing stock (including up to 960 residential units (Class C3)) and the construction of new residential buildings (including up to 2,422 residential units (Class C3)), an elderly extra care facility (including up to 51 units comprising up to 5,488 m2 (Class C2 and a community hub (sui generis uses)) and ancillary community and commercial buildings for the following purposes: uses falling within Classes A1, A2, A3, A4 & A5 (including retail, financial and professional services, cafés and a public house) (up to 2,289 m2), B1 (Workspaces and Offices) (up to 2,500 m2) and D1/D2 (Community facilities including a library, crèches, nurseries, a new primary school, a community hall, gym, youth centre, health centre, elderly support facility and a sports hall (up to 8,039 m2); sui generis uses (including a maintenance yard); car, motorcycle and bicycle parking; general servicing for the new facilities; the provision of a Local Park, pocket parks and other areas of public open space, play facilities, hard and soft landscaping and public realm improvements; a bus pick-up and set-down area and bus driver facility; energy networks and centres and renewable energy technologies; and specified accesses and highways improvements (including the remodelling of the gyratory junction on the A205 South Circular Road, new accesses on to the local road network and new estate roads).	Approved 11 th September 2008
05/02732/OUT	A residential-led mixed use re-development scheme of approximately 38 hectares of land comprising the demolition of buildings (including up to 1,003 residential units (Class C3)), the refurbishment of retained housing stock (including up to 948 residential units (Class C3)) and the construction of new residential buildings (including up to 2,366 residential units (Class C3)) and	Approved 26 th June 2006

	ancillary community and commercial buildings for the following purposes: uses falling within Classes A1, A2, A3, A4 (including retail, financial and professional services, cafés and a public house) (up to 2,332 m2), B1 (Workspaces and Offices) (up to 2,888 m2) and D1/D2 (Community facilities including a library, crèches, nurseries, a new primary school, a community hall, gym, youth centre, health centre, elderly support facility and a sports hall) (up to 8,106 m2); sui generis uses (including a maintenance yard); car, motorcycle and bicycle parking; general servicing for the new facilities; the provision of a Local Park, pocket parks and other areas of public open space, play facilities, hard and soft landscaping and public realm improvements; a bus pick-up and set-down area and bus driver facility; biomass heating facility and other renewable energy technologies; and specified accesses and highways improvements (including the remodelling of the gyratory junction on the A205 South Circular road and new accesses on to the local road network).	
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Figure 3 – Clapham Park Masterplan Relevant Planning Applications

Surrounding Planning History

- 3.9 The Site's surrounding area has been subject to several relevant planning applications however primarily are in relation to the Clapham Park Masterplan. Those of relevance have been accessed on the online planning portal for the London Borough of Lambeth.

Application Reference and Address	Description of Development	Status
21/04767/FUL 146-156 Brixton Hill and 5-6 Waterworks Road	Demolition of the existing buildings and redevelopment of the site to provide a multi-storey urban industrial and logistics estate comprising 2, two-storey buildings in Use Classes E (research and development of products or processes, or any industrial process suitable in residential areas), B2 (General industrial), B8 (Storage or distribution) and Sui Generis (Dark Kitchen) together with cycle parking and disabled car parking provision, hard and soft landscaping and associated works.	Approved 20 th September 2022

<p>21/02168/FUL</p> <p>Police Station, 47 Cavendish Road</p>	<p>Redevelopment and change of use of the former Police Station (Sui Generis) to provide 15 residential units (Use Class C3), involving partial demolition of the single-storey structure at the southern end of the Klea Avenue frontage building and the erection of a 3-storey side extension and installation of 24 no. PV panels on existing flat roof along with the erection of a new single storey structure to provide for refuse storage; erection of additional extensions to the Cavendish Road frontage building along with the demolition of a small section of the building linking the rear wing to the Cavendish Road frontage building with the retained wing of the building used to provide for cycle storage and; hard and soft landscaping within the courtyard area to provide communal amenity space.</p>	<p>Approved 31st March 2023</p>
<p>20/01264/RG3</p> <p>Land at No. 200-262 Hydethorpe Road and Bound by Thornton Road</p>	<p>Construction of a part 4, part 5 storey building comprising 14 residential units, associated cycle parking, landscaping together with associated works.</p>	<p>Approved 23rd July 2020</p>

Figure 4 – Surrounding Planning Applications

4. Pre-Application and Stakeholder Engagement

Introduction

- 4.1 This section provides an overview of the pre-application discussions and engagement with local residents and key stakeholders. A Statement of Community Involvement by Cloverdale Barclay has been submitted in support of the application and should be read in conjunction with this section of the Planning Statement.
- 4.2 The submitted proposals have addressed the pre-application and engagement matters where feasible and any relevant rationale in response to comments raised can be found in Section 7 of this Planning Statement.

London Borough of Lambeth

- 4.3 Extensive pre-application meetings with the London Borough of Lambeth have informed the proposed development. A Planning Performance Agreement (PPA) was agreed including meetings with officers to discuss the evolving proposals. The following meetings have been held with officers focusing on the respective topics:
- 29th July 2024 – Inception and Principle
 - 31st August 2024 – Design and Landscaping
 - 15th January 2025 – Transport, Access, and Waste
 - 7th February 2025 – Energy and Sustainability
- 4.4 Officers agreed the principle of residential development and 100% affordable proposals with the proposed housing mix and tenures noting their policy compliance. It was acknowledged that the site is allocated for a school however this was deemed acceptable and supported in Lambeth's Cabinet Report (January 2019).
- 4.5 Officers raised some initial concerns with the heights of the buildings to the rear of the site in proximity to Tierney Road houses. It is however noted that separation distances and perceived pinch points have increased throughout pre-application discussions. An assessment of the visual intrusion and overlooking has been carried out and detailed within the submitted Design and Access Statement including a review of the differing site levels and distances between habitable windows and daylight/sunlight compliance.
- 4.6 Officers agreed that any neighbouring amenity assessments should be carried out taking the upcoming Site F to the south of the site into consideration. Noting the vacancy of the Hayes Court building, a planning condition acknowledging this vacancy prior to commencement of Block D can be considered.

- 4.7 Details regarding car and cycle parking were generally considered acceptable by transport officers and requests were made to submit details of healthy streets and parking stress. Cycle store layouts have been submitted with the application to indicate London Cycle Design Standards (LCDS) compliance.
- 4.8 It was noted from initial designs that a 10% biodiversity net gain would not be achievable on this site due to overgrowth and vacancy over a period of time. It has been agreed with officers that the applicant can purchase biodiversity credits and have this strategy secured within the Section 106. The tree officer also requested that the applicant team take a realistic approach to retention of trees and landscaping proposals factoring in construction needs.
- 4.9 Further clarification was sought for details of energy and sustainability of which has been provided in the relevant submitted reports.
- 4.10 It is considered that the amendments made to the proposals and justifications provided in this submission address officer comments.

Design Review Panel

- 4.11 The scheme was presented to the Lambeth Design Review Panel (DRP) on 10th September 2024. This was consistent with the proposals presented at the first pre-application meeting noting the feedback received from Lambeth Officers was broadly positive.
- 4.12 The panel raised comments regarding Block C and the proposed amenity spaces. The panel commented on distances between blocks and in relation to neighbouring properties. Noting that the distances should be increased to allow for more connectivity between amenity space which appeared fragmented, overshadowed, and compromised with circulation space. The size and siting of Block C in relation to Tierney Road properties as well as Blocks A and B was questioned by the panel. It was suggested by the panel that the Block C should be omitted or replaced by a smaller block. Regarding Block D, the panel noted that the height should be revisited. It was also suggested that, to compensate the loss of Block C, the height of Blocks A and B could be increased.
- 4.13 Following the DRP, the applicant team reviewed the various options and concluded that the current heights of Blocks A and B was the most suitable considering the immediate context. Increases to the height would result in a requirement for an additional staircase and so would likely result in the loss of homes but at a higher financial cost.
- 4.14 As for Block C, various options were considered and it was concluded that the omission of Block C would place the overall feasibility of the scheme at risk, therefore it was agreed to reduce the size of Block C to minimise impacts to Tierney Road and to improve the relation between the amenity spaces. This further increased amenity spaces and connectivity throughout the site.

- 4.15 Blocks A and B were also reduced in size to improve distances with neighbouring properties. The proposed solution for Block D was to move the block away from the boundary shared with the Tierney Road houses.

Public Consultation

- 4.16 Prior to submission, the applicant has engaged in an extensive consultation process. A dedicated project website was launched providing information about the scheme, including all consultation materials, an interactive feedback form, a gallery of images and ways to get in touch. The website has been viewed by 1,098 users over a period from 13th November 2024 to 28th March 2025.
- 4.17 To raise awareness of the consultation process, several posters that detailed the location and timings of the public exhibitions and the webinar were placed in key areas around Lambeth to reach the largest number of residents. Those wishing to provide feedback could complete a survey which asked several questions about different aspects of the project.
- 4.18 Details of the consultation process was also sent to a range of stakeholders, including Ward Councillors, local businesses, cabinet members, the leader of the council, and the local MP.
- 4.19 A webinar was held on 13th November 2024 at 6.30pm. The webinar featured several members of the project team who presented key aspects of the project. At the end there was an opportunity for those watching to ask questions of the project team.
- 4.20 Two events were held at the MHTL Pop-up Hub on Mullins Place, Kings Avenue, a short walk from the site on the 14th and 16th November 2025. The exhibition featured a number of drawings, information boards, and a model of the scheme, and also provided opportunities for attendees to ask questions and provide their feedback.
- 4.21 During the events, the project team were able to gather feedback directly from the community. Key topics raised included comments around height, support for green space, and positive comments around the land not being used for a school.
- 4.22 A follow-up consultation event was held on 9th April 2025 to present the proposals to residents and interested parties. This enabled attendees to question specific details of the scheme such as construction timescales, the wider Clapham Park Masterplan, and changes made to the proposals to address overlooking concerns (such as no direct balconies or windows in Block C and only reductions in height of Block D).
- 4.23 Further information on the public consultation can be found within the accompanying Statement of Community Involvement by Cloverdale Barclay.

Summary

- 4.24 The proposals submitted have strived to address as many feedback comments received during the pre-application, consultation, and engagement stages as is feasibly possible within the constraints of the site and the intentions of the applicant. The scheme as submitted has benefitted from the discussions held and this has positively influenced the proposals.
- 4.25 Further details of how the submitted scheme has addressed the comments raised can be found within this Planning Statement, Design and Access Statement, Statement of Community Involvement, and supporting technical information.

5. Application Proposals

Introduction

- 5.1 This section provides an overview of the planning application and its specifications. This includes key parameters relating to use, affordable housing, dwelling mix, scale, design, amenity space, landscaping, sustainability, and parking.

Description of Development

- 5.2 The proposed description of development is:

“Full planning application for development of affordable residential homes (Use Class C3) within four blocks and associated landscaping, blue badge car parking and cycle parking”

Design, Layout, and Appearance

- 5.3 The proposals are for a residential scheme which will provide 129 affordable homes across four buildings between four and six storeys in height. Each of the four buildings will provide one staircase and two lifts per block (with Block C providing one lift).
- 5.4 Blocks A and B facing New Park Road, retain the prevailing building frontage of adjacent buildings. The site layout is of high-quality architectural interest and of a scale and massing in keeping with the surrounding context. Blocks A and B are designed to appear as mirror images of each other with Blocks C and D reducing in height towards the rear of the site.
- 5.5 The provision of sufficient and high-quality space within new homes is an essential element of good residential design. The proposed homes have been designed in accordance with the Nationally Described Space Standards, the London Plan (2021), the Lambeth Local Plan (2021), the Housing Design Standards – LPG, and Applicant Employer Requirements / Design Brief. All homes will meet the requirements of Part M4(2), and 10% will be M4(3) wheelchair-accessible or easily adaptable for occupation by a wheelchair user.
- 5.6 Noting the site constraints, the initial dual/enhanced aspect target for this proposal was approximately 70%. This has been achieved with the development providing 86%. The proposals have been designed to allow maximum daylight and choice of views within the dwellings given constraints of the site. Wherever possible it has been avoided to have single aspect dwellings and there are no single aspect north facing dwellings. Generously proportioned windows and doors to balconies will also allow light deep into all new dwellings.
- 5.7 The ground floor dwellings facing New Park Road within Blocks A and B have been designed to be at a higher level than the street pavement in order to address matters around privacy

and differing topographical levels. A vegetation buffer zone is proposed between the street pavement and the dwellings improving the dwelling's privacy level.

- 5.8 The ground floor layouts of each block have given thought to increase passive surveillance of the communal amenity areas, by prioritising the location of habitable rooms facing communal amenity areas, rather than plantroom and bikes or bin stores. Security of communal amenity areas will be further improved with lighting and other security measures such as CCTV.
- 5.9 Three colours of bricks are proposed as preliminary facing material to respond to the surrounding context of New Park Road but also to visually break the massing of the proposed buildings. The development will include the use of a mixed red brick for Blocks A and D, buff brick for Block B, and light red for Block C.
- 5.10 To break the horizontality of Blocks A and B main façades, the recessed corner balconies are formed with textured GRC panel with a metal balustrade to the top. Projecting balconies will follow the same language keeping the balconies definition consistent across the site.
- 5.11 Supporting materials such as coloured aluminium framed windows and metal railing to balconies and windows are in coherence with the surrounding areas.
- 5.12 The base of the blocks are defined by protruding brickwork, a textured brick pattern is also introduced to the top of the blocks to add a layer of complexity.

Housing Mix and Tenure

- 5.13 The proposed development seeks planning permission for the development of 129 affordable dwellings across four blocks (Blocks A, B, C, and D). In total, the proposals would provide 45 x social rent and 84 x intermediate units.
- 5.14 Split across four buildings, the housing mix is shown in Figures 5 and 6.

Block	1 BED	2 BED	3 BED	Total
A	13	25	5	43
B	13	24	4	41
C	6	6	2	14
D	1	22	8	31
Total	33	77	19	129

Figure 5 – Housing Mix

	1 BED	2 BED	3 BED	TOTAL
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Social Rent	7	28	10	45
Intermediate	9	49	26	84
Total	16	77	36	129

Figure 6 – Affordable Tenure Mix

Amenity Space and Landscaping

- 5.15 The proposals include a variety of designed spaces that encourage human interaction with nature, such as a community orchard, outdoor seating areas, and wildlife friendly zones. Whilst providing various communal amenity spaces, private amenity space is also provided for ground floor residents in the form of terraces and for upper floor residents in the form of private balconies.
- 5.16 The communal amenity areas will be accessible to all residents of the development. Provision of play space for 0-11 year olds is included alongside the communal amenity areas. These spaces have been designed to create spaces for community gathering, social interaction, and play, fostering a sense of belonging and connection.
- 5.17 The wooded area proposed in the north-east corner of the site will be approximately 328sqm in size with existing trees retained to further establish its woodland character. This area will provide seating and picnic areas for residents and natural play opportunities for children to encourage exploration and creativity. The play spaces will utilise the existing level changes to provide play elements such as slides and climbing structures.
- 5.18 The garden rooms space located between Blocks A, B, and C is approximately 578sqm in size and will utilise the existing level changes to create a series of terraced garden rooms. This space will incorporate natural play elements and social areas along the slopes to encourage active movement and community interaction.
- 5.19 Between Blocks C and D to the south there is a 428sqm space allocated as the active area. This will provide a dedicated space with play equipment suitable for children aged 0-11. The boundary will be preserved in order to promote a thriving ecosystem with a quiet seating area to act as a buffer zone between the play area and the semi-natural area.
- 5.20 A community orchard is also proposed and will be located in the south-east corner of the site to the rear of Block D. This area will be approximately 242sqm in size and will provide an area for residents to be involved in the maintenance and establishment of vegetation on site. This will be accessible only for future residents of the site.
- 5.21 The access road and rain gardens have been carefully considered within this development. Rain gardens have been strategically positioned along New Park Road in the natural depressions of the landscape. Rain gardens such as flower-rich planting will be used

throughout to help enrich the streetscape whilst enhancing biodiversity. These will be separated by wooden walkway meanders. An interplay of colours to demarcate parking and vehicular zones will be used across the development to create an element of interest across the hard surfaces.

Biodiversity and Arboriculture

- 5.22 The Urban Greening Factor (UGF) for this proposal was calculated as 0.62, far exceeding the policy requirement of 0.4.
- 5.23 The site is also subject to a Tree Preservation Order (TPO 456), which protects all trees that were present at the time of designation. The proposed approach considers all aspects of the proposal and ensures a balanced and sustainable tree management strategy while enhancing the site's overall greenery. The proposal aims to retain as many mature trees as possible, and any trees proposed to be removed will be replaced by equivalent value to the trees removed.
- 5.24 As part of the development, 16 individual trees and 2 groups of trees will be removed, including 4 Category B trees, 4 Category C trees, 8 Category U trees, and 2 groups of Category C trees. The Category U trees are being removed due to their poor condition. To compensate for these removals, a comprehensive planting scheme will introduce approximately 37 semi-mature trees along with approximately 28 fruit trees within a dedicated orchard area.
- 5.25 Noting the vacancy of the site for several years and the now overgrown nature, the proposals are anticipated to deliver 3.07 habitat units representing a net loss equivalent to -38.81% habitat units. It is therefore concluded that the proposals are not able to deliver a 10% net gain in biodiversity in line with National Legislation and Local Plan policy. As such, purchasing a total of 2.45 habitat units from an approved offsite BNG Credit provided such as the Environment Bank is required to ensure compliance.
- 5.26 Details of this purchase is provided within the submission setting out the applicant's strategy to achieving the 10% BNG requirement. This is to be secured within the Section 106 legal agreement.

Access and Parking

Access

- 5.27 Pedestrian access will be provided via a number of new footways along the western perimeter of the site, connecting the initial footway with the internal pedestrian network.
- 5.28 Vehicular access to the site is achieved via an upgraded crossover from New Park Road towards the southern boundary of the site shared with Hayes Court / Site F. Due to the low number of vehicular movements expected, it is proposed that this access will be shared with pedestrians.

- 5.29 The PTAL rating in the northern part of the site is 5 (high), while the southern part of the site reduces to 3 (moderate). Therefore, the site is considered to be situated within a sustainable location.

Car Parking

- 5.30 The proposals, developed in conjunction with Transport Consultants Markides Associates, are for a car-free development with blue-badge parking provided for 3% from the outset.
- 5.31 Four blue badge parking bays are provided close to the southern boundary, where vehicular access is proposed. All blue badge parking is to be provided with an electric vehicle (EV) charging point.

Cycle Parking

- 5.32 The proposals for cycle parking were developed in coordination with Transport Consultants Markides Associates and Landscape Architects PRP.
- 5.33 The design accommodates a high percentage of cycle parking within internal stores at each block and the remaining within external stores which will be secure, well-lit, and would receive natural surveillance to comply with Secure by Design requirements.
- 5.34 The proposal can accommodate 158 bikes internally, which is 65% of all required parking. Given the constrained nature of the site and focus on providing active ground floor frontages, it is not possible to provide all residential cycle parking within each respective block without compromising the effectiveness of the stores and financial viability of the site owing to a likely reduction in homes. Internal cycle parking prioritises Sheffield and accessible cycle parking and ensures that there are at least as many spaces as there are dwellings within each block. The provision externally exceeds the requirements as a total across the site, resulting in the development providing 247 cycle spaces (including 242 long stay and 5 short stay spaces).

6. Planning Policy Context

Introduction

- 6.1 This section summarises the key national, regional (London), and local (Lambeth) policies against which the planning application will be determined. It will also consider other documents that constitute material planning considerations and may be referred to during the consideration of the planning application.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan relevant to this application includes:
- London Plan (2021)
 - Lambeth Local Plan (2021)
 - National Planning Policy Framework (2024)
 - Other material considerations and supplementary planning documents
- 6.3 In addition, the National Planning Practice Guidance (NPPG) and Technical Housing Standards provide guidance at a national level and are important material considerations in the determination of planning applications. Furthermore, at a local level, Lambeth have adopted a series of Supplementary Planning Documents (SPDs) which are also material considerations. Each of these documents are reviewed in more detail below.

National Planning Policy Framework (December 2024)

- 6.4 The National Planning Policy Framework (NPPF) is the principal document against which to assess applications for development in respect of national policy objectives and was revised in December 2024. At the heart of the NPPF remains the presumption in favour of sustainable development (paragraph 10).
- 6.5 The proposals accord with the NPPF's overriding objective of delivering sustainable development, and this should be given considerable weight in determining the application. Paragraph 11 of the Framework advises that planning application decisions should apply a presumption in favour of sustainable development.
- 6.6 The NPPF considers sustainable development to have three dimensions: economic, social, and environmental. It confirms that the dimensions should be achieved jointly and simultaneously and where this is demonstrable, development should be approved without delay.

- 6.7 Chapter 4 ‘Decision Making’ states that local planning authorities should approach planning decisions in a positive and creative way, whilst also encouraging pre-application engagement to resolve issues early in the development of proposals. Additionally, it encourages Local Planning Authorities to work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area.
- 6.8 Chapter 5 ‘Delivering a Sufficient Supply of Homes’ confirms that the Government is committed to boosting the supply of homes to meet local needs.
- 6.9 Chapter 8 ‘Promoting Healthy and Safe Communities’ states that planning policies and decisions should aim to achieve healthy, inclusive, and safe places which promote social interaction, are safe and accessible, and enable and support healthy lives.
- 6.10 Chapter 9 ‘Promoting Sustainable Transport’ directs new development to locations that are highly accessible by public transport, walking, and cycling, recognising that an integrated transport system is necessary to support a strong and prosperous economy. The NPPF seeks to actively manage patterns of growth to focus significant development towards locations which are, or can be, made sustainable, thereby reducing the need to travel.
- 6.11 Chapter 11 ‘Making Effective Use of Land’ states policies should promote an effective use of land in meeting the need for homes and other uses. Paragraph 125 confirms that local authorities should support development that makes efficient use of land, considering identified need, local market conditions, the availability and capacity for infrastructure and services, as well as the importance of securing well-designed, attractive, and healthy places.
- 6.12 Chapter 12 ‘Achieving Well-Designed Spaces’ states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creating better places in which to live and work and helps make development acceptable to communities.

National Planning Practice Guidance

- 6.13 The National Planning Practice Guidance (NPPG) was originally published online in March 2014 and is a web-based resource for all material relating to planning. The guidance and policies published here form a material consideration for any planning application decision. The NPPG is a ‘real-time’ resource within individual paragraphs, updated by the Department of Levelling Up, Housing, and Communities.

The London Plan (2021)

- 6.14 The London Plan was published in March 2021 and acts as a Spatial Development Strategy for Greater London. As the overall strategic plan for the capital, it sets out an integrated

economic, environmental, transport, and social framework for the development of London over the next 20-25 years.

- 6.15 Policy GG1 ‘Building Strong and Inclusive Communities’ ensures that all proposals are focused around building strong and inclusive communities. Amongst other strategic matters, Part B of the policy states that schemes should seek to ensure changes to the physical environment to achieve an overall positive contribution to London.
- 6.16 Policy GG2 ‘Making the Best Use of Land’ targets those in planning and development to proactively explore potential to intensify the use of land to support additional homes and promote higher density developments. In addition, the policy aims to apply a design-led approach to determine the optimum development capacity of sites.
- 6.17 Policy GG3 ‘Creating a Healthy City’ focuses on improving the health of Londoner’s and reducing health inequalities. This incorporates the promotion of active and healthy lifestyles; using a Healthy Streets Approach; assessing impacts of development proposals through the use of Health Impact Assessments; seeking to improve air quality; and increasing access to green space.
- 6.18 Policy GG4 ‘Delivering the Homes Londoners Need’ aims to create a housing market that works better for all. This requires those involved in planning and development to ensure that more homes are delivered; support the delivery of affordable homes; and create mixed and inclusive communities with good quality homes meeting high standards of design providing for identified needs.
- 6.19 Policy D2 ‘Infrastructure Requirements for Sustainable Densities’ states a proposal’s density should consider the provision of infrastructure and be proportionate to the site’s connectivity to jobs and services.
- 6.20 Policy D3 ‘Optimising Site Capacity Through the Design-led Approach’ ensures development is of the most appropriate form and land use for the site whilst ensuring consideration of design options to determine the most appropriate form of development that responds to a sites context and capacity for growth. Higher density developments should be promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking, and cycling.
- 6.21 Policy D4 ‘Delivering Good Design’ states that masterplans and design codes should be used to help bring forward development and ensure it delivers high-quality design and place making. Design and Access Statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan. The design quality of development should be retained through to completion by ensuring maximum detail is provided, wording of the planning permission provides clarity, and avoiding deferring the assessment of design.

- 6.22 Policy D5 'Inclusive Design' states that development proposals should achieve the highest standards of accessible and inclusive design, that takes into account London's diverse population, provides high-quality spaces with no disabling barriers, and is able to be used with dignity for all.
- 6.23 Policy D6 'Housing Quality and Standards' states that housing development should be of high-quality design and provide adequately sized rooms and storage space. Dwellings that are dual aspect should be prioritised that provide sufficient daylight and sunlight. The policy states that a single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B of Policy D3 in regard to promoting higher density developments. The policy sets out minimum standards for private internal and outside spaces across all tenures.
- 6.24 Policy D7 'Accessible Housing' sets out that at least 10% of dwellings should meet Building Regulation M4(3) 'Wheelchair User Dwellings' with the remainder meeting Building Regulation M4(2) 'Accessible and Adaptable Dwellings'.
- 6.25 Policy D8 'Public Realm' ensures that the public realm is well-designed, safe, accessible, well connected, related to local context, and easy to understand, service, and maintain. The policy goes on to outline how public realm should function and include design elements that respond to context and need.
- 6.26 Policy D11 'Safety, Security, and Resilience to Emergency' ensures that proposals maximise building resilience and minimise potential physical risks including those arising from extreme weather, fire, flooding, and related hazards. The policy states that developments should include measures to design out crime and these should be considered at the start of the design process.
- 6.27 Policy D12 'Fire Safety' states that all major developments should be submitted with a Fire Statement including a fire strategy produced by a third party suitably qualified assessor.
- 6.28 Policy D14 'Noise' states that noise should be managed, mitigated, and minimised within the development.
- 6.29 Policy H1 'Increasing Housing Supply' sets the ten-year targets for net housing completions that each local planning authority should plan for. The policy also states that Boroughs should encourage the development of appropriate windfall sites to help meet these targets. The London Borough of Lambeth has a ten-year target of 13,350 net additional homes in the period 2019/20 -2028/29 (as identified in Table 4.1 of the London Plan).
- 6.30 Policy H4 'Delivering Affordable Housing' sets a strategic target for 50% of all new major developments (10 or more units) delivered across London to be genuinely affordable. Affordable housing should be provided on site and should only be provided off-site or as a cash-in-lieu contribution in exceptional circumstances. To assist with this aim, the Mayor

requires major developments to provide affordable housing through the ‘Threshold Approach to Applications’ (as detailed in Policy H5 of the London Plan). This requires a minimum of 35% of housing to be delivered as on-site affordable housing. A number of criteria are set out to enable a scheme to be eligible for a ‘Fast-Track’ route as identified in Policy H5.

- 6.31 Policy H6 ‘Affordable Housing Tenure’ ensures a minimum of 30% low-cost rented homes, as either London Affordable Rent or Social Rent, a minimum of 30% intermediate products, and the remaining 40% to be determined by the borough.
- 6.32 Policy H7 ‘Monitoring of Affordable Housing’ requires Boroughs to have clear monitoring processes to ensure that affordable housing secured on or off site is delivered in line with the Section 106 agreement.
- 6.33 Policy H10 ‘Housing Size Mix’ states that schemes should generally consist of a range of unit sizes that should be considered in regard to robust local evidence where available or the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment, the requirement to deliver mixed and inclusive neighbourhoods, the location of the site, and the aim to optimise housing potential on sites.
- 6.34 Policy S4 ‘Play and Informal Recreation’ ensures that developments provide at least 10 square meters of play space per child that is of adequate quality.
- 6.35 Policy G5 ‘Urban Greening’ states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of the site and building design by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage.
- 6.36 Policy G6 ‘Biodiversity and Access to Nature’ requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 6.37 Policy G7 ‘Trees and Woodlands’ states that development proposals should ensure that existing trees of value are retained where possible. In the event that planning permission is granted involving the removal of trees, the policy requires there be adequate replacement based on the existing value of the benefits of those removed. The policy states that the planting of additional trees should generally be included in new developments with a particular focus on large-canopied species providing a wider range of benefits due to their larger surface area of their canopy.
- 6.38 Policy SI1 ‘Improving Air Quality’ ensures that development proposals do not lead to the deterioration of existing air quality. As a minimum, development proposals must be at least air quality neutral and utilise design solutions to prevent or minimise increased exposure to existing air pollution. Major developments should be submitted with an Air Quality

Assessment and development proposals must also reduce impacts on air quality during construction and demolition.

- 6.39 Policy SI2 ‘Minimising Greenhouse Gas Emissions’ states that major developments should be net-zero carbon and should include a detailed Energy Strategy to demonstrate how this will be achieved. Major developments should achieve a minimum of 35% reduction beyond building regulations.
- 6.40 Policy SI3 ‘Energy Infrastructure’ states that major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system following the heating hierarchy.
- 6.41 Policy SI4 ‘Managing Heat Risk’ states that major development proposals should demonstrate through an Energy Strategy how the proposals will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
- 6.42 Policy SI5 ‘Water Infrastructure’ indicates that development proposals should achieve mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption).
- 6.43 Policy SI7 ‘Reducing Waste and Supporting the Circular Economy’ ensures that applicants work in collaboration with the Mayor and waste planning authorities to assist with resource conservation, waste reduction, increase in material re-use and recycling, and reductions in waste going for disposal.
- 6.44 Policy SI13 ‘Sustainable Drainage’ ensures that development proposals aim to achieve greenfield run-off rates and to ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy. The policy supports the use of permeable surfacing and requires that drainage is designed and implemented in ways which promote multiple benefits such as increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity, and recreation.
- 6.45 Policy T2 ‘Healthy Streets’ states that development proposals should deliver patterns of land use that facilitate residents making short, regular trips by walking or cycling. Proposals should be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport, and the dominance of vehicles should be reduced.
- 6.46 Policy T5 ‘Cycling’ ensures that development proposals help remove barriers to cycling through the provision of appropriate levels of cycle parking which should be fit for purpose, secure, and well-located. Developments should provide cycle parking at least in accordance with the minimum standards within the plan.

- 6.47 Policy T6 ‘Car Parking’ states that car parking should be restricted in line with levels of existing and future public transport and connectivity. Adequate provision should also be made for efficient deliveries and servicing and emergency access.
- 6.48 Policy T6.1 ‘Residential Parking’ defines maximum parking standards. New residential development should not exceed the maximum parking standards set out in Table 10.3 of the London Plan. This indicates that sites within Inner London areas of PTAL 3 should provide up to 0.25 car parking spaces per dwelling. All residential car parking spaces should provide infrastructure for electric vehicles with at least 20% of spaces having active provision and the remaining with passive provision. Blue badge parking should also be provided at 3% from the outset with an additional 7% to be future-proofed.
- 6.49 Policy T7 ‘Deliveries, Servicing, and Construction’ states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. There should be provision of adequate space off-street for this. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance. In addition, during the construction phase of development, inclusive and safe access for people walking and cycling should be prioritised and maintained at all times.

London Plan Supplementary Planning Guidance

- 6.50 Other policy documents that are material to the consideration and determination of this planning application include Supplementary Planning Guidance (SPG), Supplementary Planning Documents (SPD), and London Plan Guidance (LPG) prepared by the Greater London Authority (GLA). These have been taken into consideration throughout the development of the proposal.
- 6.51 A number of supplementary planning documents have been published by the Mayor of London. Whilst initially authored to be supplementary to previous versions of the London Plan, the content and best practice guidance of many of the documents remain relevant. The following London Plan Supplementary Planning Guidance (SPG) documents have been considered as part of the development:
- Accessible London SPG
 - Planning for Equality & Diversity in London SPG
 - Characterisation and Growth Strategy LPG
 - Optimising Site Capacity: A Design-led approach LPG
 - Housing Design Standards LPG
 - Public London Charter LPG
 - Fire Safety LPG *

- Affordable Housing LPG *
- Development Viability LPG *
- Affordable Housing and Viability SPG
- Housing SPG
- Play & Informal Recreation SPG
- Social Infrastructure SPG
- Urban Greening Factor LPG
- Air Quality Positive LPG
- Air Quality Neutral LPG
- Be Seen Energy Monitoring LPG
- Circular Economy Statements LPG
- Energy Planning Guidance
- The Control of Dust and Emissions in Construction SPG
- Whole Life Carbon LPG
- Sustainable Transport, Walking and Cycling

6.52 The LPGs listed above marked with an asterisk have been issued in draft. The LPGs have not yet been formally adopted.

Lambeth Local Plan 2021 (LLP)

6.53 The Lambeth Local Plan was adopted in September 2021. The Local Plan sets out the vision, strategic objectives, and policies for development in Lambeth for the period between 2020 and 2035. Amongst several strategic objectives, Lambeth's Local Plan aims to accommodate the population growth by increasing the supply of housing by at least 13,350 net additional dwellings by 2028/29⁴. In addition, Lambeth aim to increase the mix and quality of housing to address the need for all types of housing, including affordable housing and the needs of different groups in the community. The following policies are relevant in the determination of the planning application for this site.

6.54 Policy D2 'Presumption in Favour of Sustainable Development' states that the council will work proactively to ensure proposals are able to resolve issues and be approved. This reflects the presumption in favour of sustainable development contained in the NPPF.

⁴ Reflective of Policy H1 of the London Plan (2021)

- 6.55 Policy D4 ‘Planning Obligations’ states that Section 106 obligations will be sought to secure affordable housing and ensure that development proposals mitigate the impact of development.
- 6.56 Policy H1 ‘Maximising Housing Growth’ states that the council will seek to maximise the supply of additional homes to meet and exceed Lambeth’s housing requirement of 13,350 homes for the ten year period between 2019/20 and 2028/29. This is to be achieved by optimising the potential for housing delivery on all suitable sites and, in particular, maximising the delivery of affordable housing. Furthermore, the policy seeks to optimise levels of residential density in accordance with a design-led approach set out in the London Plan.
- 6.57 Policy H2 ‘Delivering Affordable Housing’ states that developments should maximise the delivery of affordable housing in accordance with the London Plan. Furthermore, affordable housing should be equivalent in siting, appearance, and layout to the rest of the development with proposals demonstrating that the integration of different tenures has been considered from the outset.
- 6.58 Policy H4 ‘Housing Size Mix in New Developments’ supports proposals that offer a range of dwelling sizes and types to meet current and future housing needs. This will depend on the housing needs of the specific community.
- 6.59 Policy H5 ‘Housing Standards’ requires all residential developments to be in accordance with the principles of good design in regard to provision of dual aspect homes as well as meeting internal and external space standards. Furthermore, the policy states that communal amenity space should receive natural light, be inclusive and accessible, incorporate natural surveillance from overlooking, and be designed to support sustainable landscape principles and practices alongside the delivery of play opportunities.
- 6.60 Policy S3 ‘Schools’ states that there is a requirement for new primary and secondary schools and that development will be supported where they help to deliver this need. This policy has the application site designated for this use labelled as ‘Site 4’. Section 6 of this Planning Statement provides further information regarding this allocation.
- 6.61 Policy T1 ‘Sustainable Travel’ promotes a sustainable pattern of development by maximising trips made by sustainable modes of transport. Therefore, development must contribute towards the improvement of inclusive access to public transport and the improvement of walking and cycling routes.
- 6.62 Policy T2 ‘Walking’ supports the delivery of public realm improvements. Development proposals should deliver an improved public realm environment for pedestrians to make walking a safer, healthier, quicker, and more direct and attractive form of travel.

- 6.63 Policy T3 ‘Cycling’ requires the provision of cycle parking facilities in accordance with the minimum standards set out in the London Plan. Proposals should include the provision of appropriate secure and covered cycle parking facilities with sufficient space to meet cycle standards set out in the London Plan.
- 6.64 Policy T6 ‘Parking’ applies the London Plan standards to promote a reduction in car ownership and private car trips. The policy states that developments located in areas of PTAL 4-6 or where development falls within an existing or planned controlled parking zone (CPZ) should be permit free.
- 6.65 Policy T7 ‘Servicing’ sets out that adequate provision should be made for servicing appropriate to the scale, form, and location of the proposed development. The policy states that servicing should take place off-street within the site.
- 6.66 Policy EN1 ‘Open Space, Green Infrastructure and Biodiversity’ states that development proposals should protect, enhance, create, or manage conservation and biodiversity interest wherever possible. Furthermore, major developments should consider Urban Greening Factor (UGF) in accordance with the London Plan. The policy continues to state that major developments in areas of open space deficiency should provide new on-site open space or access to nature improvements. Any new open space should be in addition to the external amenity space requirements set out in Policy H5.
- 6.67 Policy EN3 ‘Decentralised Energy’ states that all major developments will be expected to connect to, and where appropriate extend, existing decentralised heating networks (DHN) in the vicinity of the site.
- 6.68 Policy EN4 ‘Sustainable Design and Construction’ states that proposals should demonstrate that sustainable design standards are integral to the design, construction, and operation of the development. In addition, development should be resilient to climate change by including appropriate climate change adaptation measures.
- 6.69 Policy EN5 ‘Flood Risk’ seeks to minimise the impact of flooding in the borough with Flood Risk Assessments considering the risks of both on and off-site flooding to and from the development for all sources of flooding.
- 6.70 Policy EN6 ‘Sustainable Drainage Systems and Water Management’ states that proposals should demonstrate that there will be a net decrease in both the volume and rate of run-off leaving the site by incorporating Sustainable Drainage Systems (SuDS) in line with the London Plan drainage hierarchy.

- 6.71 Policy EN7 ‘Sustainable Waste Management’ supports the London Plan policies regarding circular economy principles and waste management.
- 6.72 Policy Q1 ‘Inclusive Environments’ states that proposals should be compliant with current best practice and reflect good practice principles for promoting child-friendly housing and environments.
- 6.73 Policy Q2 ‘Amenity’ states that development will be supported when the detailed requirements for amenity and the public realm are met within the development. This includes, visual amenity, privacy, outlook, daylight and sunlight, noise, outdoor amenity space, and impacts from service equipment.
- 6.74 Policy Q3 ‘Safety, Crime Prevention, and Counter Terrorism’ ensures that applicants engage in early pre-application discussions regarding Secured by Design initiatives to design out opportunistic crime, anti-social behaviour, violence, and fear of crime.
- 6.75 Policy Q6 ‘Urban Design: Public Realm’ supports developments that make the most effective and appropriate use of the site through high quality design. This incorporates the delivery of building lines which maintain or improve the prevailing building line and improves legibility, permeability, and convenient access via direct routes for all users, avoiding alleyways and back lanes.
- 6.76 Policy Q7 ‘Urban Design: New Development’ supports new development which, amongst other criteria, has a bulk, scale/mass, siting, building line, and orientation which preserves or enhances the prevailing local character.
- 6.77 Policy Q8 ‘Design Quality: Construction Detailing’ sets out a pragmatic approach to development noting that proposed building designs and submitted details should be buildable and visually attractive.
- 6.78 Policy Q9 ‘Landscaping’ ensures that developments provide good quality landscaping to enhance and protect the green-infrastructure and attractiveness of the site. In addition, developments are supported where landscaping proposals maximise opportunities for the provision of green infrastructure, such as through planting of trees and other soft landscaping.
- 6.79 Policy Q10 ‘Trees’ states that development will not be permitted where the result is the loss of trees of significant amenity, historic, or ecological conservation value or threatens the wellbeing of trees. In addition, the planting of additional trees should be included in new developments in a coordinated way to maximise the green infrastructure network.

- 6.80 Policy Q12 'Refuse and Recycling' states that, amongst other criteria, all refuse and recycling storage should be fully integrated into the wider design from the outset, be secure and safe, and be located away from residential accommodation to avoid harm to amenity and outlook.
- 6.81 Policy Q13 'Cycle Storage' details the requirements and design principles for cycle storage within all developments. Cycle storage should be fully compliant with the minimum standards set out in the London Plan and exceed these where a high demand for cycling is expected. The policy notes that, amongst other criteria, cycle storage should be directly and conveniently accessed from outside the building; accessible, attractive, secure, and safe to use; and in stores shared by groups of immediate neighbours.
- 6.82 Policy Q25 'Views' sets out the Council's views of local interest and that development proposals should seek to protect these. The application site falls within the Local View 'Landmark Silhouette 5a – View North-West from Christchurch Road to Christ Church'.

Lambeth Supplementary Planning Documents (SPDs)

- 6.83 Lambeth have also adopted a series of Supplementary Planning Documents (SPDs) which support the Local Plan and provide further guidance on key areas of consideration. Those of most relevant to the development proposals are the Lambeth Design Guide SPD (adopted August 2023) and the Lambeth Development Viability SPD (adopted October 2017).

7. Planning Assessment

Introduction

- 7.1 This section considers the key matters relating to the proposed uses in the context of relevant planning policy, as well as material considerations. It is important to emphasise that Section 38(6) of the Planning & Compulsory Purchase Act 2004 states that applications must be determined in accordance with the relevant Development Plan, unless material considerations indicate otherwise.
- 7.2 In this case, the planning application must be assessed against national, regional (London), and local (Lambeth) planning policy and guidance as set out in the previous section. This section details how the proposals accord with the relevant planning policies, as set out under the following sub-headings:
- Principle of Development
 - Site Layout and Design
 - Housing Mix and Affordable Housing
 - Transport and Parking
 - Landscaping, Ecology, and Biodiversity
 - Daylight and Sunlight
 - Energy and Sustainability
 - Air Quality
 - Noise and Vibration
 - Flood Risk and Drainage
 - Social infrastructure, Health, and Equality
 - Heritage and Archaeology
 - Fire

Principle of Development

- 7.3 The Land at New Park Road was previously designated for a school under Lambeth Policy S3 (referred to as ‘Site 4’). This allocation stated that the site should be developed for an *“Education use (two forms of entry as a proposed expansion of nearby Telferscot primary school, with associated nursery places) with potential for enabling residential development”*.
- 7.4 A six-storey development was previously approved⁵, featuring a school on the ground and first floors and 36 residential homes above. This scheme also included a football pitch and playground on the ground floor adjacent to the rear gardens of Tierney Road.
- 7.5 However, on 14th January 2019, a Lambeth Cabinet Report concluded that a school was no longer required on this site⁶. The proposal now seeks to provide much-needed affordable housing, better serving the evolving needs of the local community. This principle of development has been discussed with officers throughout pre-application engagement and agreed as the best approach to the site’s redevelopment.

Site Layout and Design

Scale, Massing, and Site Layout

- 7.6 The proposed layout and design were developed through extensive engagement with existing residents, Lambeth Officers, the Design Review Panel (DRP), Secured by Design Officers, and other key stakeholders.
- 7.7 The proposal harmonises with the existing 93-105 New Park Road to the north and the emerging Site F development to the south through massing that integrates seamlessly into the urban landscape. Consideration has also been made to the existing Hayes Court building to the south, noting that the dwellings facing the site are likely to be vacant at the point of commencement of the closest Block D. Officers have also agreed that to mitigate any impacts, this situation can be conditioned as both sites are within ownership of the applicant.
- 7.8 The proposed homes are designed to high standards, ensuring optimal scale, light, and proportion. They meet or exceed the Nationally Described Space Standards (NDSS) and the London Plan Guidance (LPG). The scheme is also fully compliant with policies in the Lambeth Local Plan 2021, including Policy Q2, which ensures high-quality residential design, and Policy Q7, which promotes well-integrated and context-sensitive development.
- 7.9 The development complies with London Plan Policy D6 and LLP Policy H5. All homes will meet Approved Document M requirement M4(2), and 10% will meet M4(3), ensuring wheelchair accessibility or adaptability, in line with LP Policy D7.

⁵ Forming part of the Clapham Park Masterplan Outline Permission (LPA Ref. 06/03680/OUT)

⁶ ‘Pupil Place Planning and Resultant Capital Programmes’ Report authorised by the Strategic Director for Children, Adults, and Health

- 7.10 The proposed scale and massing allows for adequate daylight and sunlight in amenity spaces while integrating with the existing and emerging urban context. The proposal reduces massing compared to the approved school scheme facing New Park Road.
- 7.11 The development consists of four blocks with varying height. Taller buildings are positioned towards the west and south, responding to the urban scale of New Park Road, while heights step down towards Tierney Road to minimise and potential impacts.
- 7.12 Of all the dwellings, 84% have openable windows on two external walls and meet the definition of dual aspect in Policy H5 of the LLP and in Policy D6 of the LP. Additionally, 67% are fully compliant with the LPG dual aspect requirements, and only 16% of the dwellings are single aspect. No dwellings are single aspect northing facing homes.
- 7.13 The ground floor dwellings facing New Park Road have been designed to be at a raised level above the street pavement to provide sufficient privacy. A vegetation buffer zone is also proposed between the street pavement and the dwellings, further improving privacy levels. The ground floor layouts of each block have been designed to enhance passive surveillance of the communal amenity areas by prioritising the location of habitable rooms facing communal amenity spaces rather than plant rooms, bike storage, or bin stores, in accordance with Policy Q3 of the Lambeth Local Plan 2021.
- 7.14 The massing is broken down through the retention of mature trees and the creation of amenity spaces, while also encouraging movement throughout the site and promoting visual connectivity.
- 7.15 Overall, the proposed massing integrates comfortably within the height parameters established for the emerging context, ensuring a cohesive and sensitive addition to the area.

Communal and Private Amenity Space

- 7.16 The site layout achieves a total of 1,133sqm of communal amenity space. The provision of external amenity space far exceeds the requirements set out by LLP Policy H5. These areas are located throughout the site and integrated alongside an additional 502sqm of playspace.
- 7.17 All dwellings benefit from private amenity spaces proportionate to their unit size either in the form of ground floor terraces and private balconies. The private amenity spaces of ground-floor dwellings are generous and typically exceed the 10sqm minimum set in LLP Policy H5.
- 7.18 Above-ground dwellings feature balconies that meet at least the minimum required area per occupant as per the London Plan Housing SPG, with additional amenity space consolidated within the communal areas, aligning with the requirements of LLP Policy H5 and LP Policy D6.

Overlooking and Privacy

- 7.19 A key design consideration of the proposed development was to reduce any impacts of loss of privacy and to avoid overlooking between the proposed and neighbouring properties, in

accordance with LLP Policy Q2 and LP Policy D3, which seek to ensure developments provide appropriate levels of privacy and mitigate overlooking impacts.

- 7.20 Block A façades were designed to minimise direct overlooking between habitable rooms with adjacent dwellings within 95-103 New Park Road and Block B. The windows along the northern façade of Block A have been designed so that none are directly opposite windows at 95-103 New Park Road. The strategically designed window locations in conjunction with floors not being at the same level, will provide adequate screening between the two. Block A and Block B windows are also positioned to avoid direct views between habitable rooms.
- 7.21 Block C's relationship with the houses along Tierney Road and their gardens was carefully considered throughout the design process. During pre-application engagement and following the Design review Panel, the length of Block C was reduced and the main aspect was moved away from the shared boundary with just high level kitchen windows facing the back gardens of the houses. The existing and proposed trees along Tierney Road gardens further act as a natural buffer, reinforcing privacy measures in accordance with London Plan Policy G7, which encourages retention and enhancement of urban greening elements.
- 7.22 The relationship between Block D and Hayes Court would result in some overlooking however, Hayes Court is expected to be demolished while the application site would be under construction. Therefore future residents will never experience the relationship with the existing building but rather the relationship with Site F of the Clapham Park Masterplan. Block D sits directly opposite to Site F's communal amenity space and the distances between the habitable rooms in Block D and those in Site F will be at least 30 metres, exceeding the minimum separation distances recommended for privacy in both the Lambeth Local Plan and the London Plan. A condition stipulating that the dwellings within Hayes Court facing the site should be vacant (and remain as so) prior to commencement of Block D would be agreeable.

Housing Mix and Affordable Housing

- 7.23 All proposed dwellings meet or exceed the minimum space standards for dwelling sizes set out in the Nationally Described Space Standard, London Plan 2021, Lambeth Local Plan 2021, and Housing Design Standards LPG. The average size of a 1B2P unit is 51sqm, a 2B3P is 65sqm, a 2B4P is 72sqm, and the 3B4P / 3B5P is 87sqm and 89sqm respectively .
- 7.24 Figure 7 shows the proposed housing mix, broken down by block and Figure 8 shows the affordable tenure mix for the entire site.

Block	1 BED	2 BED	3 BED	Total
A	13	25	5	43
B	13	24	4	41
C	6	6	2	14
D	1	22	8	31
Total	33 (25%)	77 (60%)	19 (15%)	129

Figure 7 – Housing Mix

- 7.25 It is acknowledged that Lambeth Local Plan Policy H4 stipulates a requirement for ‘*not more than 25% 1-bedroom units; 25-60% 2-bedroom units; and up to 30% 2-bedroom+ units*’. The percentages set out in Figure 7 clearly show this is achieved.

	1 BED	2 BED	3 BED	TOTAL
Social Rent	7	28	10	45 (35%)
Intermediate	9	49	26	84 (65%)
Total	16	77	36	129

Figure 8 – Affordable Tenure Mix

- 7.26 It is acknowledged that the London Plan requires 70% low cost rent and 30% intermediate to achieve the Fast Track Route. Noting that the site is not publicly owned land, a policy compliant provision across the site would be for 45 homes as affordable (35% of 129 homes). To accommodate a 70/30 tenure split, this would require 31.5 and 13.5 homes respectively. Within the 100% affordable housing provision shown in Figure 8, the social rent and intermediate tenure far exceed this requirement and therefore no viability testing would be required.
- 7.27 Haworth Tompkins have provided an Accessibility Assessment and Inclusive Design Statement in support of this application; this can be found in the accompanying DAS. The statement explains that to provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:
- At least 10% of new build dwellings meet Approved Document M requirement M4(3) ‘wheelchair user dwellings’, i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.
 - All other new build dwellings must meet Approved Document M requirement M4(2) ‘accessible and adaptable dwellings’.

- 7.28 Based on the provision of 129 units, the proposed development provides a total of 13 x M4(3) homes and 116 x M4(2) homes.

Transport and Parking

- 7.29 The site layout allows for the vehicular access to be located to the south of the site utilising access to four blue badge car parking spaces. These spaces have been located within close proximity to the wheelchair accessible homes where feasible. During pre-application engagement, consideration was made to have one space closer to Block A however this significantly impacted the provision of green and amenity space on site and reduced access to cycle stores.
- 7.30 The Transport Assessment (TA) has been provided by Markides Associates in support of this application. The TA has been prepared as a Healthy Streets Transport Assessment following the best practice guidance prepared by Transport for London (TfL) (June 2019).
- 7.31 The Healthy Streets TA provides a detailed assessment of part of the development proposals and mitigation measures proposed by the applicant that are considered necessary in relation to the proposed redevelopment of the site from a transport perspective.
- 7.32 The assessment confirms that the site is well-located with high accessibility to public transport, particularly bus services, supporting the objectives of Lambeth Local Plan Policy T3, which prioritises sustainable transport. The site's location within a Controlled Parking Zone (CPZ) and its proximity to multiple car clubs align with LP Policy T6, which aims to reduce car dependency and encourage car-free or car-lite developments.
- 7.33 An Active Travel Zone Assessment of the area surrounding the site was undertaken, finding that walking and cycling infrastructure was generally very good but noted areas where healthy streets indicators performed below optimally.
- 7.34 The proposed development is expected to generate a modest number of additional public transport trips. However, given the availability of extensive transport services in the area, this impact is considered non-material, in line with LP Policy T4, which requires developments to assess and mitigate their impact on the transport network.
- 7.35 The impact of the proposal on the public highway is considered to be beneficial given the car free nature of the site and the proposed highway works which will significantly improve the streetscape along New Park Road. The car-free nature of the site aligns with the LLP Policy T7 and LP Policy T6.1.
- 7.36 The Parking Stress Survey carried out by Markides Associates indicated that the average weekday parking stress around the site is approximately 62%, which falls well below the 85% threshold considered to indicate a stressed parking environment. These results confirm that

there is sufficient parking availability, and the development is not expected to have a significant impact on local parking capacity.

- 7.37 The proposal is not expected to cause any significant negative impact on the transport network. On balance, it is considered beneficial, particularly given the car-free nature of the site and the associated public realm enhancements, which align with London Plan Policies T2 and D8.
- 7.38 A Delivery and Servicing Plan (DSP) produced by Markides Associates outlines a commitment to annual monitoring surveys for three years following the completion of the development, ensuring compliance with LLP Policy T7 and LP Policy T8.
- 7.39 The DSP has been prepared to outline the delivery and servicing proposals for the site, which is expected to generate up to 35 delivery and servicing movements per day, the majority of which will be carried out by LGVs. These movements will be carried out from New Park Road, as well as the proposed servicing road running along the southern perimeter of the site. Some of these routes, in particular for waste collection, will be shared with neighbouring developments and will therefore be of minimal disruption to the area.
- 7.40 The DSP sets out the delivery and servicing principles for the proposed development, and has outlined a range of design and management strategies that will be implemented to ensure safe and efficient operation of delivery and servicing trips to the site.
- 7.41 The DSP is considered a live document that is intended to evolve over time as the Monitoring Plan is implemented. It outlines how the DSP will be reviewed and monitored, ensuring future commitments to the development of the DSP.

Landscaping, Ecology, and Biodiversity

- 7.42 PRP Landscape prepared a Landscape Statement to be submitted in support of this application. The landscape proposal focuses on the creation of high-quality outdoor spaces for residents, while remaining open to the wider community. The overarching aim is to complement the building architecture, creating a series of interconnected communal spaces that enhance the user experience, aligning with LLP Policies Q9 and EN4 and LP Policies G5 and D8.
- 7.43 The proposal encompasses four key areas: three interconnected communal spaces (Wooded Area, Garden Rooms, and an Active Area), including amenity play, and a community orchard to the rear of Block D.
- 7.44 The landscape design includes a range of spaces, habitats, and activities, and incorporates sustainable landscape principles, including rain gardens along areas of the New Park Road boundary and orchard. Priority has been given to high levels of permeable surfaces within the

site boundary. Bio-solar roof coverings totalling 1,225m² are proposed across all buildings, supporting LLP Policies EN1 and LP Policy SI13.

- 7.45 The Urban Greening Factor (UGF) for this proposal has been calculated as 0.62 far exceeding the target of 0.4 as set out in Policy G5 of the London Plan Guidance.
- 7.46 The proposal aimed to retain as many mature trees as possible, and any trees proposed to be removed are replaced by equivalent value to the trees removed in line with London Plan Policy G7.
- 7.47 The Arboricultural Impact Assessment conducted by Arborterra Limited identified a range of existing trees both on and adjacent to the site, including 10 Category B trees, 11 Category C trees, 8 Category U trees, 1 group of Category B trees, and 2 groups of Category C trees.
- 7.48 As part of the development, 16 individual trees and 2 groups of trees will be removed, including 4 Category B trees, 4 Category C trees, 8 Category U trees, and 2 groups of Category C trees. The Category U trees are being removed due to their poor condition. To compensate for these removals, a comprehensive planting scheme will introduce 37 semi-mature trees along with approximately 28 fruit trees within a dedicated orchard area.
- 7.49 The site is subject to a Tree Preservation Order (TPO 456), which protects all trees that were present at the time of designation. The proposed approach considers all aspects of the proposal and ensures a balanced and sustainable tree management strategy while enhancing the site's overall greenery.
- 7.50 A Preliminary Ecological Appraisal, completed by Greenwood in support of this application, recommended further survey work for bats, reptiles, invertebrates, and certain invasive species. It also highlighted the importance of protecting on-site habitats and species such as nesting birds, bats, badgers, and hedgehogs, with mitigation measures to be implemented in line with LLP Policy EN1 and LP Policy G6.
- 7.51 Greenwood also provided a Biodiversity Net Gain Assessment to accompany this application. The assessment explains that the scheme is anticipated to deliver 3.07 habitat units. This represents a net loss equivalent to -38.81% in habitat units. As the scheme does not meet the 10% net gain requirement set out in national legislation and local policy, 2.45 habitat units will be purchased from an approved offsite BNG Credit provider such as Environment Bank.
- 7.52 A Biodiversity Net Gain Note has been submitted with the application setting out this approach to achieve the 10% net gain and is expected to be secured within the Section 106.
- 7.53 It is recognised that a small area of the site to the north-east is defined in Lambeth's Policies Map as an area of Open Space Deficiency ('AOD Local Small Pocket' / 'AOD Combined Categories' / 'AOD Number of Categories'). It is however considered that the proposals seek to deliver communal amenity space which is not gated and far exceeds the policy requirements set out in LLP Policy H5.

Daylight and Sunlight

- 7.54 XCO2 were instructed to complete a Daylight, Sunlight and Overshadowing Assessment in support of this application. This assessment addresses both future occupiers of the site and existing neighbouring properties.

Neighbouring Buildings

- 7.55 For daylight, 731 windows from nearby buildings were assessed, with 677 meeting the BRE recommendations. The remaining 54 windows, located in Cameford Court, Site F, 95-103 New Park Road, and 61-107 Tierney Road, fall short of the guidelines. However, given the existing vacant site and the applicant's intentions to deliver a development which maximises affordable housing, it is anticipated that windows on lower floors will be impacted by larger obstructions which is not uncommon in an urban context. It is acknowledged that the existing Hayes Court building is due to be demolished in 2027 with works taking place during 2027 and 2028 for the completion of Site F in line with the Clapham Park Masterplan.
- 7.56 In terms of sunlight access, 383 windows were analysed, with 380 complying with the BRE recommendations representing a compliance rate of 99%.
- 7.57 The overshadowing assessment examined 54 surrounding amenity spaces over a 24-hour period on 21st March 2024, finding that 52 of these spaces receive at least two hours of sunlight covering at least 50% of their area.
- 7.58 Overall, the findings indicate that although a small number do not fully comply, the majority of windows and spaces meet the recommended standards.

Future Residents

- 7.59 The assessment of the proposed development demonstrates strong performance in terms of daylight, sunlight, and overshadowing. A total of 65 sample dwellings were analysed across ground, first, and top floors of all four blocks.
- 7.60 A total of 197 rooms were assessed in terms of daylight and the results show that 34 out of 65 living, kitchen and dining rooms and 114 out of 132 bedrooms meet the BRE recommendations. Further analysis and justification for the bedrooms that are below standards can be found in the submitted Daylight, Sunlight & Overshadowing Assessment by XCO2.
- 7.61 Sunlight analysis of 65 living spaces found that 47 meet the BRE standards, while those that fall short still benefit from private balconies and access to communal amenity spaces, which align with LLP Policy Q2.
- 7.62 The overshadowing assessment confirms that all three proposed amenity spaces comfortably meet BRE guidelines, with sunlight exposure covering over 50% of their areas (A1: 78%, A2: 53%, and A3: 92%).

- 7.63 Overall, the proposed development is expected to achieve adequate daylight levels across all dwellings and habitable spaces, ensuring high-quality living conditions. The design is also considered to provide optimal sunlight access within the constraints of the site, offering a well-balanced approach to natural light availability, in line with LLP Policy Q2 and LP Policy D6.

Energy and Sustainability

Energy

- 7.64 The Energy Statement by XCO2 outlines a comprehensive strategy to achieve significant carbon reductions. The proposed development is expected to achieve a 74.9% reduction in regulated CO₂ emissions compared to a Part L 2021 compliant scheme, equating to annual savings of 106.4 tonnes of CO₂. To support long-term carbon reduction goals, the development plans to connect to the Hemiko Clapham Park district heating network. To achieve a carbon neutral proposal, the predicted carbon offset payment of £101,800.
- 7.65 The strategy follows the GLA's energy hierarchy:
- **Be Lean (Use Less Energy):** Gas boilers with a gross efficiency of 89.5% were used in SAP calculations to demonstrate the effectiveness of passive and active energy efficiency measures before integrating low-carbon technologies.
 - **Be Clean (Supply Energy Efficiently):** The development prioritises connection to the local district heating network. If this is deemed unfeasible within the required timeframe, a roof-mounted communal Air Source Heat Pump (ASHP) system will be implemented as an alternative.
 - **Be Green (Use Renewable Energy):** A feasibility study identified photovoltaic panels as a suitable renewable energy source. A 416sqm PV array will contribute to a 2.5% reduction in regulated CO₂ emissions.
- 7.66 This strategy ensures that the development meets high sustainability standards while maximising energy efficiency and carbon savings.

Sustainability

- 7.67 A Sustainability Statement has been produced by XCO2 to demonstrate the environmentally responsible design and construction of the development. The development incorporates effective resource management by reusing previously developed land, applying whole life carbon and circular economy principles throughout the design stages, enhancing site greening, and integrating renewable technologies.
- 7.68 To ensure adaptation to climate change, the project is expected to achieve CO₂ savings of 106.4 tonnes per year through a combination of passive and active measures, including

optimising daylight, maximising photovoltaic panel use, insulating pipework, and implementing efficient lighting to minimise heat generation.

- 7.69 The design also aligns with BRE recommendations for both future and surrounding residents and introduces sustainable drainage systems to manage flood risks effectively. Pollution management strategies focus on reducing air pollution during construction and operational phases, maintaining an air quality neutral approach, implementing acoustic mitigation measures, and encouraging sustainable transport by minimising car dependency and increasing cycle provision. These measures ensure that the development prioritises long-term sustainability, resilience, and environmental responsibility.

Circular Economy

- 7.70 XCO2 have produced a Circular Economy Report in support of this application. The report is structured around the six Circular Economy (CE) principles which are outlined in the Greater London Authority's Guidance on Circular Economy Statements (2022). These principles should be a fundamental part of the design process and are as follows:

- Building in Layers;
- Designing out Waste;
- Designing for Longevity;
- Designing for Adaptability or Flexibility;
- Designing for Disassembly;
- Using Systems, Elements or Materials that can be Reused or Recycled.

- 7.71 The design approaches adopted directly support the implementation of the six circular economy principles. These include building in layers, with tailored circular economy strategies for each layer based on function and lifespan, and designing out waste by efficiently using resources throughout all design stages.

- 7.72 The project prioritises longevity by incorporating durable materials and considering climate change resilience while also ensuring adaptability through a flexible internal layout that allows refurbishment without impacting the main structure. Although the superstructure and façade do not inherently support disassembly, internal layers with shorter lifespans will prioritise mechanical connections for easier replacement. The scheme also integrates materials and systems that can be reused or recycled wherever possible.

- 7.73 Additionally, the project acknowledges the retrofitting of previous (now demolished) buildings and adopts a 'fabric first' approach to reduce energy demand and CO₂ emissions. The development will meet GLA requirements as well as the resource efficiency and waste management requirements of Policy EN7 of the LLP and Policy SI7 of the LP, ensuring that

95% of demolition, excavation, and construction waste is recycled, with at least 20% of building materials sourced from recycled or reused content.

Whole Lifecycle Carbon

- 7.74 A Whole Lifecycle Carbon Assessment was carried out by XCO2 in support of this application whilst ensuring compliance with Policy SI2 of the London Plan. The results indicate that the superstructure is expected to contribute the most to the project's embodied carbon, accounting for approximately 48-53%, followed by building services, including 'in use' emissions, at around 21%. To refine these findings and ensure a comprehensive evaluation, a further detailed WLCA would be sought to be conditioned.

Overheating

- 7.75 XCO2 have undertaken an Overheating Risk Assessment which has been submitted in support of this application. All habitable residential rooms assessed were found to meet Approved Document Part O overheating risk criteria for the London Weather Centre DSY1 weather data (2020 High 50 Percentile) when incorporating a combination of natural ventilation, solar control, and security measures into the design.
- 7.76 An analysis has also been undertaken assuming windows are unable to be fully open overnight to limit noise ingress in line with the acoustician's recommendations and the results are predicted to remain compliant with Approved Document Part O requirements and LP Policy SI4.

Air Quality

- 7.77 The Air Quality Impact Assessment produced by XCO2 concludes that while the construction phase has the potential to generate dust beyond the application boundary, the implementation of an Air Quality and Dust Management Plan will effectively minimise these impacts, making them unlikely to be significant and ensure compliance with LP Policy SI1.
- 7.78 The proposed development is car-free, except for blue badge spaces, ensuring that operational traffic-related air quality impacts remain negligible. Additionally, heat and hot water will be supplied via a 100% electric district heating network (DHN), further reducing emissions and supporting LLP Policy EN3 and LP Policy SI3.
- 7.79 The development is also designed to accommodate air source heat pumps as an alternative if a connection to the District Heat Network is not feasible, ensuring a flexible and sustainable energy solution.
- 7.80 Overall, the development is classified as air quality neutral for both building and transport-related emissions, demonstrating its commitment to maintaining good air quality standards.

Noise and Vibration

- 7.81 XCO2 have completed an Environmental Noise Assessment in support of this application. This was conducted through continuous sound pressure level measurements between 11:00 AM on 1st October 2024 and 3:15 PM on 2nd October 2024.
- 7.82 Monitoring took place at two locations; one to the east on Tierney Road and another to the west on New Park Road. The primary noise source at both locations was local road traffic, with occasional aircraft noise.
- 7.83 The assessment considered environmental noise in relation to the Mechanical Ventilation with Heat Recovery (MVHR) system, compliance with Part O overheating requirements when windows are open, the positioning of outdoor amenity areas behind Blocks A and B, and plant noise locations. The analysis confirms that plant noise locations and mitigation strategies have been effectively managed, ensuring no significant noise impacts, in accordance with LLP Policy Q2 and LP Policy D14.

Flood Risk and Drainage

- 7.84 A Flood Risk Assessment and Drainage Strategy Report was completed by Tullys in support of this application and to ensure compliance with LLP Policy EN6 and LP Policy SI12.
- 7.85 The assessment confirms that the site is located within Flood Zone 1, meaning it has a low risk of flooding, with an annual probability of less than 0.1% for river flooding. Under the NPPF, the proposed development is classified as 'More Vulnerable,' which is appropriate for a Flood Zone 1 location.
- 7.86 The site falls within the Streatham Hill Critical Drainage Area, and a small area in the south-western corner is identified as having low to medium surface water flood risk due to an existing low point and hard standing. While significant surface water flooding is present in the adjacent block to the south, topographical analysis indicates that this lower-lying area will not impact the proposed development.
- 7.87 The Flood Risk Assessment and Drainage Strategy Report includes the Lambeth Sustainable Drainage Proforma, outlining mitigation measures to ensure the site remains at an acceptable flood risk level. With these measures in place, the development can be safely and sustainably drained throughout its lifetime without increasing flood risk elsewhere, in line with LLP Policy EN5 and LP Policy SI 13.

Social Infrastructure, Health, and Equality

Social Infrastructure

- 7.88 A Social Infrastructure Impact Assessment was completed by Greengage to accompany this application. The potential infrastructure impacts of the proposed development have been

assessed using a variety of methods to determine the local capacity for the new population likely to be brought forward by the proposal, in response to Policy S2 in the LLP. The report demonstrates a largely neutral impact on social infrastructure capacity with only a temporary impact on local healthcare services.

Health

- 7.89 Greengage were commissioned to complete a Health Impact Assessment in support of this application. The potential health impacts of the proposal have been fully assessed against the NHS Healthy Urban Development Unit's 'HUDU Planning for Health – Healthy Urban Planning Checklist', which has enabled completion of the 'HUDU Planning for Health – Rapid Health Impact Assessment Tool'.
- 7.90 This involved assessing the proposal against 52 criteria, of which 31 have a positive impact on health, 9 a neutral impact, and 2 a negative impact. Further analysis is available within the report and generally, the proposal will have a positive impact on the health of future residents, supporting the objectives of LLP Policy H5 and LP Policy GG3.

Equality

- 7.91 An Equalities Impact Assessment has been completed by Greengage in support of this application, with its purpose to assess the impact of the proposed development on persons who share a relevant protected characteristic and determine whether mitigation should be secured, in line with LLP Policy D4 and LP Policy GG1.
- 7.92 The development is not considered to have any negative impacts on the equalities of different protected groups. The majority of impacts are neutral during construction and operation phases and inclusive design represents a key consideration of the proposal. In accordance with Policy Q1 of the LLP and London Plan design principles, equalities impacts will continue to be considered as part of the design process and community engagement approach during the detailed design stages.

Heritage and Archaeology

Heritage

- 7.93 A Heritage Statement produced by HCUK Group assesses the designated heritage assets closest to the site, including Telford Park Conservation Area, Rush Common and Brixton Hill Conservation Area, and Brashiers Cottage (Grade II Listed), as well as the 'Local View Landmark Silhouette 5a', making sure the proposal remains compliant with LLP Policy Q20 and LP Policy HC1.
- 7.94 The assessment also considers the site's proximity to several other statutorily listed buildings and conservation areas. However, due to their orientation, distance, and the built form

between them and the site, the surroundings in which these heritage assets are experienced would not be affected. Additionally, the proposed development would not be visible from surrounding conservation areas or in key views of statutorily listed buildings ensuring compliance with LLP Policies Q22 and Q23.

- 7.95 The proposals have been developed based on a thorough understanding of the significance of these identified heritage assets. They aim to secure the long-term use of the site while remaining sympathetic to its historic context, preserving, if not enhancing, the unique heritage values of the assets. The assessment concludes that the proposals will preserve the significance of both designated heritage assets, including the Grade II listed building and conservation areas, as well as non-designated heritage assets.

Archaeology

- 7.96 An Archaeological Desk-Based Assessment has been prepared by HCUK Group in support of the proposed development. The assessment confirmed that the site contains no designated archaeological heritage assets such as scheduled monuments or registered battlefields. The Greater London Historic Environment Record (GLHER) has 25 records within the 350m radius study area, seven of which are listed buildings. Two of these records are within the site itself and comprise the below-ground remains of buildings associated with the development of the Clapham Park Estate in the early 19th century and also with the later mid-20th century Clapham Park Housing Estate.
- 7.97 The site is located approximately 250 metres from both the Brixton Hill Archaeological Priority Area and the Brixton Causeway Roman Road Archaeological Priority Area. An archaeological evaluation carried out on the site in 2007 as part of the Clapham Park Regeneration Scheme found below-ground evidence for the 19th century Clapham Park Estate. No features were found that predated the 19th century.
- 7.98 Based on existing information, the assessment has indicated that there is a high potential for below-ground archaeological remains to be present within the site associated with housing from both the early 19th century and the mid-20th century, the importance of which has been assessed as low. There is a low potential for archaeology from all other periods.

Fire

- 7.99 Robson Frankham have completed a Fire Strategy in support of this application. The strategy confirms that all buildings will be equipped with a sprinkler system, and the evacuation strategy follows a 'stay put' approach. All floors will function as compartment floors, and each flat will be designed as a separate fire compartment. Every block will have an evacuation lift, with dedicated ventilation in the lift lobbies and direct access to an escape stair. None of the buildings exceed the 18-metre threshold, with the tallest being Block A at 16.9 metres.

- 7.100 During the design process, the publication of BS 9991:2024 introduced new requirements for evacuation lifts and smoke control, necessitating design adjustments to ensure compliance. Despite some buildings having an uppermost storey below 11 metres, the applicant will provide sprinkler protection in line with BS 9251:2021.
- 7.101 Block C, which has limited road access, will include provisions for a fire appliance to reach within 18 metres of the building and will be fitted with a dry fire main to comply with the 60-metre hose-laying requirement for sprinkler-protected buildings. These measures ensure a high level of fire safety and compliance with current regulations.
- 7.102 The Fire Strategy confirms that the development meets LP Policy D12, ensuring a robust fire safety strategy. The measures proposed ensure full compliance with fire safety regulations and best practices.

8. Affordable Housing Statement

- 8.1 This section provides a detailed chapter on affordable housing. In addition to the policy analysis undertaken in Section 7 of this Planning Statement, this affordable housing statement covers matters of housing needs, delivery of affordable housing, and the nature of the affordable housing being provided.

Registered Provider of Social Housing

- 8.2 In 2018, Metropolitan Housing Trust Limited (MHTL) was formed through the merger of Metropolitan and Thames Valley Housing. They are a housing association which provides affordable housing for people living in London, the Southeast, East Midlands, and East of England and own, manage, or administer around 57,000 homes across the country. MHTL manage the regeneration of the Clapham Park and Ashmole Estates in Lambeth.

Needs Assessment

- 8.3 There is an evidenced and calculated need for affordable housing nationally, regionally, and locally. The 2021 Census data states that in England, average house prices increased by 14% in 2021 while average earnings reduced by nearly 1% which has led to housing becoming much less affordable⁷. Furthermore, housing affordability worsened in 300 out of 331 (91%) of local authorities within England and Wales and the average house price increased in 96% of local authority districts while the average earnings increased in only 50% of local authorities.
- 8.4 At a regional level, Paragraph 4.6.3 of the London Plan states that the Mayor is committed to delivering genuinely affordable housing and the preferred housing tenures are homes based on social rent levels, including Social Rent and London Affordable Rent, London Living Rent, and London Shared Ownership.
- 8.5 Policy H4 of the London Plan states that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable. The 2017 London Strategic Housing Market Assessment (SHMA) formed part of the London Plan evidence base. The SHMA identifies that London needs around 66,000 net new homes a year to meet its housing need.
- 8.6 In addition, the 2017 SHMA identifies a net annualised requirement for new homes between 2016 and 2041 is 13,554 low-cost rent one bedroom units and 8,376 low-cost rent two bedroom units (the highest of all affordable tenures). Low-cost rent also formed 47% of the total homes needed. This was a significant increase from the 2013 London SHMA which was 10,225 and 1,003 respectively for the period between 2015/16 and 2034/35. Further to this,

⁷ Office for National Statistics: Housing affordability in England and Wales (2021): [Housing affordability in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/housingaffordability)

London's 2021 Affordable Housing Monitor indicates that London needs around 31,000 new homes each year at social rent levels.

- 8.7 It is evident that at a national, regional, and local level, there is a significant need for the delivery of affordable housing. While London and Lambeth are delivering affordable housing, there is a clear need to deliver more.

Affordable Tenures

- 8.8 The proposal is for a 100% affordable development scheme with 65% as intermediate and 35% social rent.
- 8.9 London Plan Policy H6 states that 35% of housing in a development should be affordable with a tenure split of 30% low-cost rented homes, 30% intermediate, and the remaining 40% to be determined by the borough. Whilst the overall split of this development is 65:35 weighted towards intermediate, it delivers an additional 65% of affordable housing than what is required by Policy H6.
- 8.10 It is acknowledged that the London Plan requires 70% low cost rent and 30% intermediate to achieve the Fast Track Route. Noting that the site is not publicly owned land, a policy compliant provision across the site would be for 45 homes as affordable (35% of 129 homes). To accommodate a 70/30 tenure split, this would require 31.5 and 13.5 homes respectively. Within the 100% affordable housing provision, the social rent and intermediate tenure far exceed this policy requirement.

Affordable Housing Benefits

- 8.11 The proposed affordable housing delivery will lead to the following overarching benefits:
- An increase in affordable homes
 - An increase in affordable habitable rooms
 - An increase in affordable floorspace
 - Safe, modern, and energy efficient homes

9. Planning Benefits

- 9.1 This planning application accords with adopted planning policies at a national, regional, and local level. Beyond the technical compliance, this chapter summarises the key benefits that would result from the approval of this application.

Delivery of 129 homes

- 9.2 The London Plan states that Lambeth has a minimum ten-year housing target of 13,350 net additional homes (1,335 annually). The delivery of 129 homes, would make a meaningful contribution to these targets. The new homes incorporate a high-quality design and site layout providing residents with better quality housing. The provision of sufficient and well-designed spaces within new homes is an essential element of good residential proposals.

100% Affordable Homes

- 9.3 The proposal is for a 100% affordable development scheme with 65% as intermediate and 35% social rent. London Plan Policy H6 states that 35% of housing in a development should be affordable with a tenure split of 30% low-cost rented homes, 30% intermediate, and the remaining 40% to be determined by the borough. Whilst the overall split of this development is 65:35 weighted towards intermediate, it delivers an additional 65% of affordable housing than what is required by Policy H6.

Efficient Use of Vacant Land

- 9.4 The site was previously demolished in 2016, leaving the area to become overgrown and unused. A large area of vacant land such as this site is at risk of antisocial behaviour and can provide a habitable area for rodents. The redevelopment of this site is an efficient use of land by providing 129 affordable homes in a borough where there is an evidenced need for housing.
- 9.5 The proposed development will provide a variety of spaces for social interactions and an increase in communal areas, thereby creating natural surveillance as supported by Secured by Design Officers.

Increase in Open Space Provision and Landscaping

- 9.6 The site layout has created a scheme designed around various communal areas. These spaces would be overlooked by all future residents, creating a safe and naturally surveyed space which connects all buildings across the site.
- 9.7 The landscaping strategy also includes the provision of communal gardens and play spaces adjacent to the proposed residential buildings. This design prioritises safety and greenery providing a balance of private amenity and communal well-being. This includes picnic tables, growing areas, and sheltered seating areas for residents to sit quietly, relax, and socialise.

High-Quality Architectural Design

- 9.8 The development has been designed by Haworth Tompkins Architects, whose projects have won over 100 awards including numerous Housing Design Awards and the AJ100 Practice of the Year Award.
- 9.9 This scheme has been through extensive pre-application and engagement where the designs have developed taking consideration of comments raised where feasible.

Encouragement of Sustainable Modes of Transport

- 9.10 The proposals are for a car-free development with blue-badge parking provided for 3% from the outset. Four disabled parking bays are provided close to the southern boundary, where vehicle access is proposed. All disabled parking is to be provided with an Electric Vehicle Charging Point.
- 9.11 In addition to the car-free development, the proposals would deliver 247 long-stay cycle parking spaces split according to each building. Within this provision, 158 spaces will be internal storage and 89 will be external.
- 9.12 This arrangement would encourage future residents to utilise more sustainable modes of transport including walking and cycling.

Sustainability Benefits

- 9.13 Redevelopment of the site will contribute towards a number of Lambeth and London's sustainability objectives, firstly by optimising the use of existing previously developed land. The proposals also include a number of measures to minimise greenhouse gas emissions and introduce renewable technologies such as possible connection to the District Heating Network. Through the application of the energy hierarchy, the proposals will ensure a carbon saving of 106.4 tonnes CO₂ per annum or 74.9% against the Part L target.

Immediately Deliverable

- 9.14 The applicant, Metropolitan Housing Trust Limited, are the sole owners of the site and have hoarded the western boundary facing New Park Road. Upon approval, the applicant can progress with the development immediately. The development would be constructed in one phase ensuring provision of affordable housing for the borough.

10. Summary & Conclusion

- 10.1 This Planning Statement has been prepared on behalf of Metropolitan Housing Trust Limited. Full planning permission is sought for the following:

“Full planning application for development of affordable residential homes (Use Class C3) within four blocks and associated landscaping, blue badge car parking and cycle parking”

- 10.2 The site is located in the Clapham Park Ward in the London Borough of Lambeth. The site used to house two buildings, Aspinall House at 3 to 4 storeys and Parsons House at 6 storeys, which were demolished several years ago, in 2016. The site has been vacant since then and is hoarded.
- 10.3 The planning proposal is largely in accordance with the development plan and provides significant improvements to the current state of the site.
- 10.4 The proposals have benefitted from substantial stakeholder and community engagement which has shaped the proposals positively. This has included public consultation events and engagement with the London Borough of Lambeth and Design Review Panel. Together with extensive technical consultations, the proposals represent a rigorously evaluated and high-quality scheme.
- 10.5 The key planning benefits of the proposal include:
- Delivery of 129 homes
 - 100% Affordable Homes
 - Efficient Use of Vacant Land
 - Increase in Open Space Provision and Landscaping
 - High-Quality Architectural Design
 - Encouragement of Sustainable Modes of Transport
 - Sustainability Benefits
 - Immediately Deliverable
- 10.6 This is an exciting scheme which will provide a boost to the local and wider housing supply for the borough and for London.
- 10.7 Taken together, the planning application accords with the planning policy framework and will deliver numerous and considerable benefits. The case for planning permission is compelling. The applicant is in a position to start work on site quickly following approval.

Appendix A: Section 106 Draft Heads of Terms

The below lists out the anticipated Heads of Terms to be incorporated within the Section 106 Legal Agreement . These are to be discussed and agreed with the Local Planning Authority during the determination of the planning application.

- Affordable Housing Provision
- Carbon Offset Payment
- Biodiversity Net Gain Credits
- Section 278 Highways Works